

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	
ANWAR RAO, et al.,)	No. 4:14CR150 JAR/TCM
GREG SLOAN, et al.,)	No. 4:14CR152 RWS/NCC
MARK PALMER, et al., and)	No. 4:14CR175 AGF/DDN
PAMELA TABATT, et al.,)	No. 4:14CR187 JAR/DDN
)	
Defendants.)	

**GOVERNMENT'S STATUS REPORT REGARDING PRE-TRIAL
DISCLOSURE OF EVIDENCE**

COMES NOW the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and James C. Delworth, Jennifer Winfield and Erin Granger, Assistant United States Attorneys for said district, and files this status response pursuant to the oral request of the Court during a pretrial conference on January 8, 2015, regarding pre-trial disclosure of evidence.

This status report will supplement the prior status reports filed on December 1, 2014 and December 31, 2014. On January 8, 2015, the government distributed Batch 6 to the attorneys present at the status conference and mailed out Batch 6 to the attorneys who were not present. An inventory list of the items disclosed to date is being filed under seal in conjunction with this status report as "Attachment A" (to be electronically filed separately). As discussed at the status conference, the parties have requested the inventory list be filed under seal in order to

protect the privacy interests of the defendants. A more detailed index for each batch was disclosed to defense counsel when each batch was released.

Additionally, a draft of the proposed protective order was distributed to the attorneys present at the status conference and sent out to the attorneys who were not present. The defense attorneys were to review the protective order and get back to the government with any suggested changes.

The government indicated that it was working on putting together Batch 7 which, with the subsequently identified exceptions, would complete the disclosure of discovery items obtained at the time of indictment. The government was still awaiting the receipt of a few lab reports with respect to the Tabbatt case and also from the Illinois search in the Rao case. The government seized a number of electronic storage devices including computers, laptops and telephones. Searches were undertaken pursuant to search warrants or consent searches. The government is in the process of preparing the relevant material obtained from the seizure of computers and other electronic storage devices for disclosure to the defendant from whom the item was seized. Upon review, the government is requesting, as it has with respect to the items in Batch 4 and Batch 6A, that each defendant consent to the disclosure of this material to all defendants pursuant to the terms of the previously referenced protective order. The government will also make available an image of each computer on Addonics drives for inspection by the defendant from whom the computer was seized. Upon consent of the defendant and subject to a protective order, the government would be willing to make the drives available to all defense counsel. Due to the limited number of Addonics drives, the drives will be loaned out for one week during which time they may be examined and/or copied before being returned to the United States Attorney's Office.

Finally, the government stated that a number of subjects have agreed to cooperate. As part of their cooperation, the subjects have consented to provide the government with electronic storage devices to search, documents, and access to e-mail accounts. This material will be disclosed to the defendants during the course of future discovery. The timing will be dependent upon accessing the material and putting it into a discoverable format.

WHEREFORE, the Government hereby files this status report regarding the production of discovery undertaken from the period of the December 31, 2014 status report to the present.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

/s/ James C. Delworth
JAMES C. DELWORTH, #29702MO
JENNIFER A. WINFIELD, #53350MO
ERIN O. GRANGER, #53593MO
Assistant United States Attorneys
111 South 10th Street, Room 20.333
St. Louis, MO 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of January 2015, the foregoing was filed electronically with the Clerk of the Court for the United States District Court, Eastern District of Missouri, to be filed by operation of the Court's electronic filing system upon:

All Counsel of Record for defendants.

/s/James C. Delworth

JAMES C. DELWORTH

Assistant United States Attorney